

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
FILED
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2004 APR 13 A 10:27

UNITED STATES OF AMERICA)	U.S. DIST. ATTORNEY
)	CRIMINAL ACTION
v.)	
)	NO. 04-4004-NMG
MICHELLE CARPENTIER)	

JOINT INITIAL STATUS CONFERENCE REPORT AND REQUEST TO SEND CASE
TO THE DISTRICT COURT

The United States of America, by Assistant U.S. Attorney William H. Connolly, and the defendant Michelle Carpentier, by counsel, Timothy Watkins, Esq., jointly submit this memorandum pursuant to the Notice of Initial Status Conference of this Court dated March 12, 2004. The parties address herein the issues delineated in L.R. 116.5(A) (1) - (A) (7).

The parties hereby state that an initial status conference is not necessary and request that the case be sent to the District Court for purposes of setting a date for a Rule 11 hearing.

(1) Whether relief should be granted from the otherwise applicable timing requirements imposed by L.R. 116.3:

No.

(2) Whether the defendant requests discovery concerning expert witnesses under Fed.R.Crim.P. 16(a)(1)(E):

No.

(3) Additional Discovery:

The parties do not anticipate further discovery.

(4) Should motion date be established?

No.

(5) Periods of Excludable Delay:

Both parties agree to the periods previously excluded by orders of the Court on March 12, 2004. In addition, the parties agree, subject to the Court's acceptance, that the time between March 27, 2004, and April 23, 2004, should be excluded in the interests of justice pursuant to Title 18, United States Code, Section 3161(h)(8)(A), to allow the parties further time to review discovery and negotiate an early resolution to the case.

(6) Is trial anticipated?

No. The case will be resolved by plea.

(7) Request for final status conference:

The parties request a final status conference as both sides continue to discuss the possibility of a plea agreement.

Michelle Carpentier
Defendant

By: Timothy Watkins (WTC)
Timothy Watkins, Esq.
Attorney for Defendant
Federal Defender's Office

MICHAEL J. SULLIVAN
United States Attorney

By: William H. Connolly
William H. Connolly
Assistant U.S. Attorney